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October 17, 2017

Marlene Dortch, Esq.  
Secretary  
Federal Communications Commission  
445 12th Street S.W.  
Washington, D.C. 20554

Dear Ms. Dortch:

RE: Main Studio Rule, MB Docket 17-106

This will report on telephone calls I had today with Kate Black, Legal Advisor to Commissioner Jessica Rosenworcel, and with David Grossman, Chief of Staff to Commissioner Mignon Clyburn, regarding the Main Studio Rule docket.

In 2008, MMTC engaged a statistician, Dr. Fredrick Holt, who analyzed data on 458 radio clusters in the top 50 radio markets. Using a t-test analysis, it appeared that on average, clusters that were minority owned and/or ethnic programmed had between a 12% and 16% smaller share of their total stations licensed in the largest community of license – meaning that under the main studio rule, minority owned and/or ethnic programmed clusters had over one-third fewer stations per required studio. Dr. Holt found this disparity to be relatively large, statistically significant, and that it held up when controlling for market size. MMTC traced the disparity to the history of minorities getting into broadcasting later than others, such that they wound up serving large markets with inferior, often multiple suburban locations each requiring its own main studio while non-minority broadcasters who got into broadcasting earlier could also serve large markets with several stations each operating from a single downtown studio. MMTC demonstrated that this “tax on Blackness and Brown-ness” drove capital away from minority entrepreneurs. A copy of our May 18, 2008 Supplemental Comments in the Broadcast Localism Proceeding, containing this analysis, is attached.

In subsequent years, MMTC, through its operation of stations donated to it that it has used to train minority and women broadcast managers for ownership, has come to realize that the Main Studio Rule is unnecessary. While the FCC should ensure that all broadcasters provide program service that meets local needs, the methods by which they do so should be left to the discretion and creativity of broadcasters. Public broadcasters, LPFM stations and internet stations have chosen to invest in programming rather than in “brick and mortar” studio buildings that few visit or utilize. Technology has rendered the rule an anachronism and it is overdue for repeal. I expressed MMTC’s hope that the commissioners would, at a minimum, concur with other commissioners in endorsing its repeal.

Sincerely,

*David Honig*

David Honig  
President Emeritus and Senior Advisor

Attachment

cc: Kate Black, David Grossman